Joint Water Commission

General Manager
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June 28, 2010

FCC Secretary Marlene H. Dortch
Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Office of Engineering and Technology Requests Information on Use of 16751710 MHz Band, ET Docket No. 10-123

Dear Secretary Dortch:

On behalf of the Joint Water Commission (JWC), I am writing in response to the FCC's request for information on the use of the 1675-1710 MHz Band. I also urge you to reserve and preserve its current use for transmission of USGS stream gage data, NOAA national weather satellite service data and other weather and water information that is critical for water agencies and municipalities around the country. These information sources are key to day-to-day water planning but equally important to ongoing efforts to adapt to climate change.

The Joint Water Commission (JWC) is the water supply agency for the cities of Hillsboro, Forest Grove, Beaverton, and the Tualatin Valley Water District serving high quality drinking water to approximately 400,000 people in the Portland Metropolitan area. This area has experienced tremendous growth and our population is expected to double within the next 40 years.

The NOAA Geostationary Operational Environmental Satellites Data Collection System (GOES DCS) enables a large variety of environmental data to be transmitted and relayed from remote field locations on the earth, up through GOES and back to earth, where these data are disseminated to the system users.

USGS has measured the flow of the nation's rivers and streams since 1889. The USGS real-time stream gage data is collected from over 11,400 stations through the GOES DCS. Several basin stakeholders partner with the USGS through the Cooperative Water Program to ensure that these critical USGS hydrological gauges are maintained on streams and lakes. The use of the 1675-1710 MHz Band has allowed for JWC members to receive real-time transmission of this stream gage data. Water utilities and other water resource managers use and analyze this hydrologic data for research and to manage the quantity and quality of our nation's water resources. During flood events, stream gages are critical tools for forecasting, warning, planning and emergency response along the rivers and streams impacted. More recently, streamflow data has offered early warning signs about the early impacts of climate change on regional water supplies. In addition,

USGS will rely on this stream gage data to develop its Water Census, a critical accounting of the amount of water available across the U.S. for human and ecological uses.

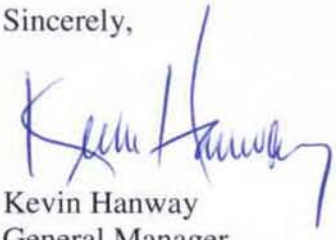
The proposed use of the 1675-1710 MHz Band would require the GOES-DCS users like USGS to lose the ability to download data directly from the GOES DCS and instead rely on an Internet vendor for the data. This would greatly degrade the real-time function and reliability of the current stream gage system and likely negatively impact local emergency response during flood events if the Internet service is interrupted or fails completely. An advantage of having this data transmitted via GOES DCS broadcast is the fact that the data is not impacted by events that can interfere with terrestrial communications.

Moreover, the backup system for the whole stream gage program is tied to the GOES DCS that uses the 16751710 MHz band. If this backup system were unavailable, it would cost USGS millions of dollars to find and employ new backup systems. In addition, all 11,400 stream gage sites would have to be replaced and reprogrammed at a tremendous cost during a time when the federal budget is extremely tight.

In addition to the USGS stream gage data, many local governments served by the JWC member utilities receive information including satellite images from the National Weather Service or Emergency Managers Weather Information Network (EMWIN). JWC is concerned that moving or reducing the ability for these services to use the GOES DCS would negatively impact the ability of local governments to protect the health and welfare of its citizens during emergencies.

In summary, JWC recommends that the 1675-1710 MHz frequencies remain available for use of the federal government's critical data transmission services. Local governments and the public rely on government to maintain its critical satellites for the wealth of data and information necessary for managing our nation's water resources for the benefit of society.

Sincerely,



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